

ORIGINAL

COGAN, J.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

ZEV YOURMAN

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

VERIZON COMMUNICATIONS, JOSEPH

SANTOS, BRIAN BLOODGOOD, NAKIS THOMAS,

MARIAN WATKINS, HANS VESTBERG, RONAN DUNNE,

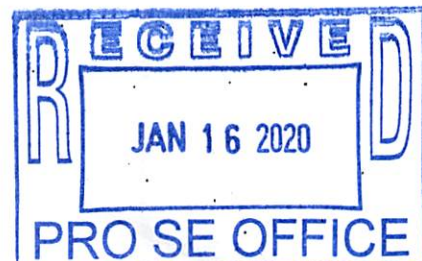
J. DOES 1-50

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. **CV20-336**
(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No
(check one)



I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

| | |
|--------------------|---|
| Name | <u>ZEV YOURMAN</u> |
| Street Address | <u>1274 49TH STREET, # 525</u> |
| City and County | <u>BROOKLYN - KINGS</u> |
| State and Zip Code | <u>NEW YORK 11219</u> |
| Telephone Number | <u></u> |
| E-mail Address | <u></u> |

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

| | |
|------------------------------|---|
| Name | <u>VERIZON COMMUNICATIONS</u> |
| Job or Title (if known) | <u>- TELECOMMUNICATIONS CORPORATION</u> |
| Street Address | <u>ONE VERIZON WAY</u> |
| City and County | <u>BASKING RIDGE</u> |
| State and Zip Code | <u>NEW JERSEY, 07920</u> |
| Telephone Number | <u></u> |
| E-mail Address (if known) | <u></u> |

Defendant No. 2

| | |
|----------------------------|--------------------------|
| Name | <u>JOSEPH SANTOS</u> |
| Job or Title (if known) | <u>VERIZON REPAIRMAN</u> |
| Street Address | <u>ONE VERIZON WAY</u> |
| City and County | <u>BASKING RIDGE</u> |

State and Zip Code NEW JERSEY, 07920
Telephone Number _____
E-mail Address _____
(if known) _____

Defendant No. 3

Name BRIAN BLOODGOOD
Job or Title Sr ANALYST-EXECUTIVE RELATIONS-VERIZON
(if known) _____
Street Address ONE VERIZON WAY
City and County BASKING RIDGE
State and Zip Code NEW JERSEY, 07920
Telephone Number _____
E-mail Address _____
(if known) _____

Defendant No: 4

Name NAKIS THOMAS
Job or Title EXECUTIVE RELATIONS- VERIZON
(if known) _____
Street Address ONE VERIZON WAY
City and County BASKING RIDGE
State and Zip Code NEW JERSEY, 07920
Telephone Number _____
E-mail Address _____
(if known) _____

II.----- Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

DEFENDANT NO: 5

NAME: MARIAN WATKINS
Job or TITLE: VERIZON EMPLOYEE
STREET ADDRESS: ONE VERIZON WAY
CITY AND COUNTY: BASKING RIDGE
STATE AND ZIP CODE: NEW JERSEY, 07920
TELEPHONE NUMBER:

DEFENDANT NO: 6

NAME: HANS VESTBERG
Job or TITLE: CHAIRMAN AND CEO VERIZON
STREET ADDRESS: ONE VERIZON WAY
CITY AND COUNTY: BASKING RIDGE
STATE AND ZIP CODE: NEW JERSEY, 07920
TELEPHONE NUMBER:

DEFENDANT NO: 7

NAME: RONAN DUNNE
Job or TITLE: EXECUTIVE VICE-PRESIDENT AND GROUP CEO VERIZON CONSUMER
STREET ADDRESS: ONE VERIZON WAY
CITY AND COUNTY: BASKING RIDGE,
STATE AND ZIP CODE: NEW JERSEY, 07920
TELEPHONE NUMBER:

DEFENDANT NO: 8

NAME: J. DOES 1-50
Job or TITLE: EMPLOYEES OF VERIZON
STREET ADDRESS: C/O VERIZON - ONE VERIZON WAY
CITY AND COUNTY: BASKING RIDGE,
STATE AND ZIP CODE: NEW JERSEY, 07920

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

47§206, 47§207, 47§406, 28§1367

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) ZEV YARMAN, is a citizen of
the State of (name) NEW YORK.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated
under the laws of the State of (name) _____,
and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

UPON KNOWLEDGE AND BELIEF ALL DEFENDANTS ARE BASED IN NEW JERSEY
a. If the defendant is an individual
ALL INDIVIDUAL DEFENDANTS ARE EMPLOYEES OF VERIZON
The defendant, (name) VERIZON IS BASED, is a citizen of
the State of (name) IN NEW JERSEY. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) VERIZON, is incorporated under the laws of the State of (name) UPON KNOWLEDGE AND BELIEF NEW JERSEY, and has its principal place of business in the State of (name) NEW JERSEY. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

THE DAMAGE THE DEFENDANT CAUSED TO PLAINTIFF'S APARTMENT WILL COST AT LEAST \$80,000 TO REPAIR, NOT INCLUDING OTHER DAMAGES

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

PLAINTIFF HAD LIFELINE VERIZON SERVICE - DURING SUMMER OF 2018 SERVICE WAS OFF REPEATEDLY - VERIZON FRAUDULENTLY INFORMED PLAINTIFF PROBLEM WAS WITH LINE IN APARTMENT IN BROOKLYN, NY. REPAIRMAN JOSEPH SANTOS CAME TO PLAINTIFF'S APARTMENT ON 10/10/2018, SANTOS DAMAGED APARTMENT, LEFT EQUIPMENT AND DIDN'T COMPLETE WORK, SANTOS NEVER CAME BACK, VERIZON EMPLOYEES NAMI THOMAS, 10/18/18, MARIAN WATKINS CALLED PLAINTIFF AND REFUSED TO GIVE IDENTIFYING INFORMATION AND THEN HUNG UP - 11/17/18. PLAINTIFF CONTACTED ATTORNEY GENERAL - NY - WITH COMPLAINT ABOUT ABOVE, VERIZON EMPLOYEE BRIAN BLODGOLO STATED FALSELY THAT I REFUSED TO LET REPAIRMAN IN APARTMENT TO ATTORNEY GENERAL 1/11/19. HANS VESTBERG AND ROMAN/DUNN EXCLUSIONS OF VERIZON HAVE POLICIES THAT ALLOW THE ABOVE AND REFUSE TO IMPLEMENT PRIOR POLICIES AND SUPERVISION TO PREVENT THE ABOVE, VERIZON 1-50 CONTRIBUTED TO THE ABOVE - SHUTTING OFF MY SERVICE CUT PLAINTIFF OFF FROM SOCIETY.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

1. INJUNCTION TO ORDER VERIZON TO RESTORE PLAINTIFFS' SERVICE;
 2. INJUNCTION TO ORDER VERIZON TO RETRIEVE THEIR EQUIPMENT FROM PLAINTIFFS' APARTMENT;
 3. FINANCIAL RESTITUTION FOR DAMAGE TO APARTMENT BY REPAIRMAN;
 4. FINANCIAL RESTITUTION FOR LEAVING EQUIPMENT AND CAUSING DANGEROUS SITUATION;
 5. FINANCIAL RESTITUTION FOR HARASSMENT AND ABUSE SUFFERED AT THE HANDS OF VERIZON EMPLOYEES;
 6. FINANCIAL RESTITUTION FOR CUTTING OFF PLAINTIFF FROM SOCIETY;
 7. FINANCIAL RESTITUTION FOR LIBELING - DEFAMATION - OF THIS PLAINTIFF, NOT LIMITED TO ABOVE;
 V. Certification and Closing - PUNITIVE DAMAGES - \$5 MILLION, OTHER DAMAGES \$5 MILLION (DESTRUCTION OF PLAINTIFFS' LIFE)

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 1/14/2020

Signature of Plaintiff

Printed Name of Plaintiff

DRAGON off AT COURT 1/16/2020